

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Thomas Cook; Megan Dresch; Laura
Galaburda; Jack Glover; David Hall; Monica
Hill; Jenny Lynn Kopfstein; Jennifer McGinn;
Justin Peacock; James E. Pietrangelo II; Derek
Sparks; Stacy Vasquez,

Plaintiffs,

v.

Donald H. Rumsfeld, Secretary of Defense;
Michael Chertoff, Secretary of Homeland
Security; United States of America,

Defendants.

Civil Action No. 04-12546 GAO

**MOTION FOR LEAVE TO FILE MEMORANDUM BY NON-MOVING PLAINTIFFS
TO ADDRESS DEFENDANTS' OPPOSITION TO JAMES E. PIETRANGELO II'S
MOTION FOR RECONSIDERATION**

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May 30, 2006

Plaintiffs who have not joined Mr. James E. Pietrangelo II's Motion for Reconsideration ("Non-Moving Plaintiffs") hereby request leave to file the accompanying Memorandum to Address Defendants' Opposition to Mr. Pietrangelo's Motion for Reconsideration. In support of this motion, Non-Moving Plaintiffs state that Defendants' Opposition purports to characterize Plaintiffs' arguments in the underlying proceeding, and Non-Moving Plaintiffs wish to respond briefly to those characterizations. Mr. Pietrangelo and counsel for Defendants have both indicated that they do not oppose Non-Moving Plaintiffs' Motion.

Respectfully submitted,

Thomas Cook; Megan Dresch; Laura Galaburda; Jack Glover; David Hall; Monica Hill; Jenny Lynn Kopfstein; Jennifer McGinn; Justin Peacock; Derek Sparks; Stacy Vasquez

By: /s/ Matthew A. Stowe
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Dated: May 30, 2006

CERTIFICATE OF SERVICE

I, Matthew A. Stowe, hereby certify that I caused a copy of the within document to be served by electronic notification upon:

Mark T. Quinlivan
Assistant United States Attorney
United States Attorney's Office
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 9200
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A paper copy has been sent to:

James E. Pietrangelo, II, Esq.
P.O. Box 9231
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/s/ Matthew A. Stowe
Matthew A. Stowe

Dated: May 30, 2006